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IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

N RE	*	
	*	CASE NO. 14-00792 BKT
MARIA IVETTE ORTIZ RIVERA	*	
	*	CHAPTER 13
DEBTOR	*	

DEBTOR'S MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM LIQUIDATION OF SICK LEAVE 2013
TO THE HONORABLE COURT:

NOW COMES, **MARIA IVETTE ORTIZ RIVERA**, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

- 1. Pursuant to Section 1306(a)(1) and (2) of the Bankruptcy Code, 11 U.S.C. Section 1306(a)(1), (2), property of the estate includes "... all property . . . that the debtor acquires after the commencement of the case but before the case is closed . . . " and "earnings from services performed by the debtor after the commencement of the case but before the case is closed . . . ". 11 U.S.C. Section 1306(a)(1) and (2).
- 2. The debtor has received the 2013 employer's liquidation of sick leave for the year 2013, in the sum of \$1,445.11. Attached is copy of the check as received from the debtor's employer, *Corporacion del Fondo del Seguro del Estado*, dated April 4, 2014. Attached is copy of invoice for said purchase.
- 3. The debtor respectfully submits to the Court that she needs these funds to pay for: purchase of security windows for her residential property, due to security reasons.
- 4. The debtor is living within a "tight" budget which covers the household monthly expenses and a Plan payment of \$380.00.
- 5. Based on the abovestated, the debtor respectfully requests this Court to Order the authorization of the use of these funds to allow the debtor to pay for this expense with

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the "2013 sick leave liquidation".

WHEREFORE, debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the 2013 "sick leave liquidation" by the debtor to pay for the above stated expense.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq.; I also certify that a copy of this motion was sent via US Mail to Maria Ivette Ortiz Rivera, PO Box 1206 Yabucoa PR 00767; and to all creditors and parties in interest as per the attached master address list.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 7th day of April, 2014.

/s/ Roberto Figueroa Carrasquillo RFIGUEROA CARRASQUILLO LAW OFFICE PSC USDC #203614 ATTORNEY FOR PETITIONER PO BOX 186 CAGUAS PR 00726 TEL NO 787-744-7699 FAX 787-746-5294 Email: rfigueroa@rfclawpr.com



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CORPOI Nombre / Dirección MARIA I. ORTIZ RIVERA (REGION HUMACAO) P.O. BOX 1206 YABUCOA PR 767-1206	ESTADO LIBRE ASOCI CION DEL FONDO DE Depósito 1 20386191 Empleado xxxxx1864 Periodo Termir 2014-04-15	***1,445.11 Seguro Socia XXX-XX-1864	al Di	4/04/14 v/Dept 01/822
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Label Matrix for local noticing 0104-3 Case 14-00792-BKT13 District of Puerto Rico Old San Juan

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(p) CITIBANK PO BOX 790034 ST LOUIS MO 63179-0034

Sears/Cbna PO Box 6283 Sioux Falls, SD 57117-6283

MARIA IVETTE ORTIZ RIVERA PO BOX 1206 YABUCOA, PR 00767-1206

RELIABLE FINANCIAL SERVICES PO BOX 21382 SAN JUAN, PR 00928-1382

PO Box 70290 San Juan, PR 00936-8290

Coop A/C Yabucoena y/o Yabucoop Sistema De Retiro PO Box 1 Yabucoa, PR 00767-0001

Asociacion de Empleados de Ela

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Radio/cbna PO Box 6497 Sioux Falls, SD 57117-6497

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MONSITA LECAROZ ARRIBAS OFFICE OF THE US TRUSTEE (UST) OCHOA BUILDING 500 TANCA STREET SUITE 301 SAN JUAN, PR 00901

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified

by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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